



Todd & WeldLLP

Christian G. Kiely
E-mail: ckiely@toddweld.com

May 3, 2021

VIA ECF

Honorable Loretta A. Preska
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

Re: *Giuffre v. Dershowitz*, Case No.: 19-cv-03377-LAP
Request to File Under Seal

Dear Judge Preska:

Pursuant to Rule 1.A of Your Honor's Individual Practices, Professor Alan Dershowitz ("Professor Dershowitz") respectfully requests leave to file under seal (with a redacted version filed to the public docket) his Motion to Compel the Production of Certain Attorney-Client Communications on the Basis of Waiver, or, in the Alternative, Request for *Zolin* Examination. As grounds therefore, Professor Dershowitz states that the Memorandum references and attaches discovery materials which have been designated confidential by Plaintiff and by non-parties under protective orders entered in this action. Professor Dershowitz makes this request without prejudice to his right to later challenge the propriety of some or all of those confidentiality designations.

Respectfully submitted,

/s/ Christian G. Kiely
Christian G. Kiely

cc: All counsel of record, via email